

MICHAEL J. MCAVOYAMAYA, ESQ. (14082)  
TIMOTHY E. REVERO, ESQ (14603)  
MCAVOY AMAYA & REVERO, ATTORNEYS  
1100 E. Bridger Ave.  
Las Vegas, NV 89101  
Telephone: 702.685.0879  
Facsimile: 702.995.7137  
Mike@mrlawlv.com  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MICAH D. KALENOWSKI ,  
Plaintiff,  
vs.  
JORDAN MILLER.  
Defendants.

Case No.: 2:20-cv-01743-GMN-VCF

**STIPULATION TO CONTINUE TRIAL**

**First Request**

Defendant Jordan Miller and Plaintiff Micah Kalenowski, hereby stipulate as follows:

**I. GOOD CAUSE WARRANTS AN EXTENSION OF THE TRIAL SCHEDULE TO FEBRUARY 2026.**

Extensions of deadlines must be supported by a showing of good cause. *DeRosa v. Blood Systems, Inc.*, No. 2: 13-cv-0137-JCM-NJK, 2013 WL 3975764, at \*1 (D. Nev. Aug. 1, 2013). Federal Rule of Civil Local Rule 26-4 provides that all Motions to extend deadlines must “be supported by a showing of good cause for the extension.” See LR 26-4. Further, “[a] motion or stipulation to extend a deadline set forth in a discovery plan must be received by the court no later than 21 days before the expiration of the subject deadline,” otherwise the request must also be supported by a showing of excusable neglect. *Id.* see also LR IA 6-1.

1           The parties have been diligently preparing for trial. However, matters in Plaintiff's  
2 counsel's personal life and work conflict in other cases necessitate moving the trial in this case to  
3 next year. Plaintiff's counsel has been dealing with the death of his step-mother in August of last  
4 year and has since been dealing with the administration of her estate in Texas. Plaintiff's counsel's  
5 father had a stroke the year prior. Plaintiff's counsel's father could not administer the state himself  
6 and Plaintiff's counsel has been required to travel to Texas repeatedly throughout the year.  
7 Additionally, Plaintiff's counsel presently has two criminal trials set to proceed in the Eighth  
8 Judicial District Court in the month of September, the same month as the present trial. In one of  
9 those cases, the State has invoked the right to speedy trial and the Court has thus far refused every  
10 request to move the trial. In the other case, the matter is over 5 years old, was just reassigned upon  
11 the disqualification of the prior presiding judge, and the State is unwilling to move the trial. The  
12 latter trial is set for September 15, 2025, and is very likely to overlap with the present trial schedule  
13 in this case.

14           Defendant's counsel has agreed to move the trial, but unfortunately has trial settings and  
15 other firm calendar conflicts in October, November and December of 2025. For these reasons, and  
16 for good cause shown, the parties respectfully request that the Court grant their first request to  
17 move the trial date to a date no earlier than February 2026. The parties stipulate and agree that this  
18 extension is necessary and good cause exists to grant the extension. The parties seek this extension  
19 in good faith.

20 ...

21 ...

22 ...

23 ...

24 ...

...

...

...

**CURRENT TRIAL DATE**

1. Trial: 9/22/2025

**PROPOSED TRIAL DATE**

1. Trial: 2/23/2025 or the Court's nearest available date

DATED this 9th day of July, 2025.

KAEMPFER CROWELL

McAVOY AMAYA & REVERO

By: */s/ Kristopher Kalkowski*

By: */s/ Michael J. McAvoy-Amaya*

LYSSA S. ANDERSON  
Nevada Bar No. 5781  
KRISTOPHER J. KALKOWSKI  
Nevada Bar No. 14892  
  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, Nevada 89135  
*Attorneys for Defendant Jordan Miller*

MICHAEL J. McAVOYAMAYA  
Nevada Bar No. 14082  
TIMOTHY E. REVERO  
Nevada Bar No. 14603  
1100 E. Bridger Ave.  
Las Vegas, NV 89101  
*Attorneys for Plaintiff*

**IT IS ORDERED** the jury trial is continued to 2/23/2026 at 8:30 AM in Courtroom 7D.  
**IT IS FURTHER ORDERED** that Calendar Call is continued to 2/17/2026 at 9:00 AM in Courtroom 7D.

DATED this 9 day of July, 2025.

  
UNITED STATES DISTRICT COURT JUDGE